### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

U.S. D	DISTRICT COURT - N.D. OF N.Y
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	MAR <b>2 1</b> 2012
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Lawrence K. Baerman, Clerk - Plattsburgh	

UNITED STATES OF AMERICA,

**INDICTMENT** 

GLS CRIM. NO. 12-CR-<u>141</u> (DANA)

Count 1: 21 U.S.C. § 846 Count 2: 21 U.S.C. § 952

MIHALE LEVENTIS, aka "Rookie," aka "Big Mike," and LESLIE GRANT,

v.

Counties of Offense: Franklin, Clinton

Count 3: 18 U.S.C. § 1956(h)

Defendants.

THE GRAND JURY CHARGES:

#### **COUNT I**

# CONSPIRACY TO POSSESS WITH THE INTENT TO DISTRIBUTE AND TO DISTRIBUTE A CONTROLLED SUBSTANCE

Between in or about 2007 and June 2009, in Franklin and Clinton Counties in the Northern District of New York and elsewhere, the defendants,

> MIHALE LEVENTIS, aka "Rookie," aka "Big Mike," and LESLIE GRANT,

and others, known and unknown, conspired to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. That violation involved one thousand (1,000) kilograms or more of a mixture and substance containing a detectable amount of marijuana and five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

#### **COUNT II**

#### CONSPIRACY TO IMPORT A CONTROLLED SUBSTANCE

Between in or about 2007 and in or about June 2009, in Franklin and Clinton Counties in the Northern District of New York and elsewhere, the defendants,

MIHALE LEVENTIS, aka "Rookie," aka "Big Mike," and LESLIE GRANT,

and others, known and unknown, conspired to knowingly and intentionally import into the United States from a place outside of the United States, namely Canada, a controlled substance, in violation of Title 21, United States Code, Sections 952(a) and 963. That violation involved one thousand (1,000) kilograms or more of a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 960(b)(1).

### **COUNT III**

## CONSPIRACY TO LAUNDER MONETARY INSTRUMENTS

Between in or about 2007 and in or about June 2009, in Franklin and Clinton Counties in the Northern District of New York and elsewhere, the defendants,

MIHALE LEVENTIS, aka "Rookie," aka "Big Mike," and LESLIE GRANT,

and others, known and unknown, conspired to transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds from a place in the United States to and through a place outside of the United States and to a place in the United States from and through a place outside of the United States (a) with the intent to promote the carrying on of specified unlawful activity, that is conspiracy to possess with the intent to distribute and to

distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1)

and 846, and conspiracy to import a controlled substance, in violation of Title 21, United States

Code. Sections 952(a) and 963; and (b) knowing that the monetary instruments and funds

involved in the transportation, transmission, and transfer represented the proceeds of some form

of unlawful activity and knowing that such transportation, transmission, and transfer was

designed in whole and in part (i) to conceal and disguise the nature, the location, the source, the

ownership, and the control of the proceeds of such specified unlawful activity; and (ii) to avoid a

transaction reporting requirement under State or Federal law, in violation of Title 18, United

States Code, Sections 1956(a)(2)(A) and (B).

All in violation of Title 18, United States Code, Section 1956(h).

Dated: March 20, 2012

RICHARD S. HARTUNIAN

UNITED STATES ATTORNEY

Daniel C. Gardner

ASSISTANT U.S. ATTORNEY

Bar Roll No.: 515333